

SUMMARY OF STATE BURDEN REDUCTION RECOMMENDATIONS AND EPA COMMENTS

PROGRAM: Grants and Other Administrative

Reporting Requirement	State Recommendation	States	Regional Comments	Office of Grants & Debarment Comments
MBE/WBE	--Eliminate (other federal grants don't require) (SC)(HI); --Report annually, not quarterly (MA)(NH); --Change deadline from quarterly to annually (IN); --Change reporting from quarterly to annual for SRF and superfund grants (NE); --Annual reporting should be sufficient (VA)	SC, MA, IN, NE, VA, NH, HI	R1: Defers to new rule (semi-annual reporting) R3: Defers to rule R4: No comment R5: annual reports OK R7: OSDBU needs to evaluate if reports still are relevant	Required by statute/executive order but new rule (to be finalized in April 2007 and become effective on October 1, 2007) reduces reporting frequency from quarterly to semi-annually. HQ will conduct outreach/education activities with states and regions on requirements of new rule.
Small Business Compliance	State requesting more flexibility to manage program	UT	R8: believes state has sufficient flexibility to develop its own program and has done a credible job in this area.	
Quality Management Plan (QMP)	Review every 5 yrs instead of every 2 yrs	IN, HI	R5: <i>Agrees</i>	EPA has the flexibility to allow this review time frame. The current requirement in EPA's R-2 Quality Requirements document allows for up to 5 years unless the national program managers or regions find significant performance problems that warrant more frequent reviews. Discussion should take place during state-region PPA negotiations or other suitable venue in order to establish appropriate conditions and review time frames.
Resource Flexibility and Recognition Credit for Innovative Programs	Create easy predictable formula for trading resources from any traditional and innovative programs	MA	R1: Agrees with problem outlined by MA	EPA will work with ECOS to address issue.
Quarterly Financial Status Reports	Reduce frequency; not all federal agencies require them	MD, IN	R3: HQ is working to combine the SF272 and FSRs R5: <i>Agrees</i> ; recommends retaining semi-annual and annual reporting	OGD agrees that quarterly FSRs ordinarily are not necessary; subject to consultation with OMB, we will determine reduced frequency in consultation with GMOs and states by 10/1/07. OGD will consult with OMB, which is currently considering

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				consolidating the FSR and Cash Transaction Report into one report (it is unclear at this time what the frequency of a consolidated report might be). OGD will call OMB to explore the issue.
Annual Monitoring Equipment Purchase Form	Eliminate. Info is provided during grant application process	SC	R4: <i>Disagrees:</i> Region needs documentation of equipment purchases.	OGD will consult with regions to determine what is/should be required.
Quarterly grant reports	--Brownfields grants: move deadline from 30 to 60 days of the end of the quarter (MD) --Brownfields and Superfund grants/cooperative agreements: change deadline from 30 to 60 days (MA) --Stop requiring for smaller grants (UIC, pesticides, PCBs, Pb, asbestos) (MA) --Target reporting to EPA national performance measures (ME) --104(b)(3) wetland grant: simplify these reports into one annual report (OK) -- EPA water grants (including sec. 106, 319, 104(b)(3), 104(g), wetlands, etc.): reduce reporting to annual or less often and eliminate reporting, with the exception of a final report, on grants of \$100k or less. (WI)	MD, MA, ME, OK, MA, WI	R3: This is a regulatory requirement. R5: disagrees; semi-annual reporting allows EPA track progress and identify/correct deviations at an early stage.	--Programmatic requirement: the grant rule states that progress reports should be not more than quarterly and not less than annually (40 CFR 31.40). Individual program offices that sponsor the grant determine the frequency of progress reports within those limits. OGD and OCIR will follow-up with NPMs to seek a resolution to the issue. --Changing deadline from 30 days to 60 days for Superfund cooperative agreements requires a grant rule change (40CFR 35.6650). (MD, MA)
Reporting for PPA/PPG and categorical grants	--Eliminate progress reports for individual grants included in the PPA/PPG and shift from quarterly to annual reporting (VA); --Reporting for all grants should be annual; grants for less than \$100k should only be reported when grant completed (MI) --PPA end of year report (annual) should	VA, MI, UT, AL, KY, IA, SD, NE,	R3: Region is checking with state to determine what reports it is referencing. Region should be able to resolve this issue for the next PPG which will start in October 2007.	HQ will consult with regions to determine what is/should be required.

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	only document results for PPA workplans (UT) --Delete quarterly for CWA 105 and accept annual report (AL) --Eliminate reporting to grant personnel because it is already submitted to program personnel (KY) --Eliminate PPG workplan report as successful completion of other workplan activities is evidence staff is trained (IA) --Originally prepared multi-year PPAs: EPA requires annual updates, which are so extensive many streamlining benefits have been lost (SD) --PPG: eliminate reporting related to largely state-based programs (NE) --Eliminate PPG workplan reporting related to state-based programs that are not federally funded and target PPG workplan reporting directly to EPA National Performance Measures (AZ)	AZ	R5: Agrees in general with MI regarding annual grants reporting (supports with caveats); disagrees with MI regarding grants for less than \$100k.	
Federal Cash Transaction Report	Eliminate annual submission; data is available in EPA's ASAP database	MD	R3: HQ is working to combine the SF272 and FSRs.	This report is required by OMB and the Dept. of Treasury. EPA will consult with them to determine whether the report can be eliminated. As noted above, OMB is currently considering consolidating the Federal Cash Transaction Report and the Financial Status Report into one report.
ASAP Database Reporting	Ask for less information when states enter financial draw requests	MD	R3: This information is required for cost recovery.	The information appears to be needed for LUST and Superfund cost-recovery purposes. OGD will consult with OSWER and OCFO on whether the information requirements can be reduced.
Grants: misc. issues	--Grant records retention: standardize 3 yr (some states have 5 yr) (MD)	MD, WI,	R3: Longer time frame is needed for cost recovery	--Records retention: OGD agrees that 3 years is the general rule

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	<p>--Grant application: require less detailed explanations for travel, supplies, etc. and accept estimates of state's best judgment at the time of grant application (WI)</p> <p>--Grant application documents (certifications and pre-award compliance review): R6 should allow TX to batch and file once per year (TX)</p> <p>--Competitive grant requirements: for P2, Pb, asbestos grants, states with solid track record should not have to compete for these grants (MD)</p> <p>--Treat Lead, Asbestos, P2 grant applications as a core program – grants should not be awarded competitively (UT)</p>	TX, MD, UT, WI	<p>purposes.</p> <p>R5: Agrees in principle, but due to grant oversight requirements, cannot comply.</p> <p>R6: Agrees with TX. Suggests that GAD reinstate their grant streamlining process.</p>	<p>(except for Superfund). We will work with the GMOs and states to clarify this.</p> <p>--Grant application: new cost review policy, to be issued in 3/07, will streamline process. (WI)</p> <p>--Grant application documents: a number of the certifications/forms are project-specific and therefore it is unclear whether they can be batched. OGD will need to consult with OMB to resolve. OMB's common rule for state grants does not specifically address bundling of certifications.</p> <p>--Competitive grant requirements: Competition is a high priority at EPA. EPA's Grants Competition Advocate will consult with OPPTS and the Regions about these specific competition requirements. The regulation for TSCA Section 28 Compliance Monitoring grants was recently revised to allow those grants to be awarded on a non-competitive basis (see 40 C.F.R. 35.312).</p>
State and federal database reconciliation for data to support program operational monitoring	<p>--Implement EPA's database warehouse strategy</p> <p>--Schedule changes for programs concurrently</p> <p>--Limit changes to every 3 yrs.</p> <p>--Coordinate comments through ECOS</p> <p>--Allow use of ECHO to populate legacy system, not other way around</p>	OR, MA	<p>R1: Agrees and supports effort</p> <p>R10: Agrees in principle, suggests looking for opportunities.</p>	OGD will consult with regions to determine what is/should be required.
TSCA grant applications	Consolidate TSCA grant (only \$54,000) with other larger grants; could also apply to resource conservation challenge	KY	R4: state requested use of TSCA Cooperative Agreement for purpose of conducting compliance monitoring inspections. EPA	TSCA section 404 (g) grants provided to states on a formula basis or otherwise exempt from the Agency's competition policy can be included in PPGs and also

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			cannot combine because funding allocation issues.	consolidated with other program grants under 40 CFR 35.109.
Certification regarding lobbying and assurances in grant application	Eliminate and replace documentation with an annual blanket assurance from the state agency to EPA	VA, HI	R3: As per HQ, certification statements are different and should not be blanketed.	These certifications and a number of the assurances are project specific and therefore it is unclear whether we can bundle them. OGD will need to consult with OMB. OMB's common rule for state grants does not specifically address bundling of certifications.
Improve system for reviewing state comments on NPM guidance, regional work commitments and measures	Identify what is new from previous year. Respond to state comments; transparency for all documents	MA, CT	R1: Agrees; suggests initiating a pilot study to handle complex subject	EPA will work with ECOS on improvements